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UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

VISHAL SAXENA, Ph.D.,
Plaintiff,

v.

UNIVERSITY OF MASSACHUSETTS
MEDICAL SCHOOL,
Defendant.

CIVIL ACTION NO. 4:19-CV-40007-TSH

**MOTION TO RECONSIDER ALLOWING PLAINTIFF TO FILE UNDER CANON 3A(4) AND
MOTION TO STAY THE CASE SINCE PLAINTIFF'S COUNSEL HAS BEEN IN THE ER**

The Plaintiff in the above named action, Dr. Vishal Saxena, hereby respectfully requests the court to reconsider the motion to allow Dr. Saxena to file for recusal under Canon 3A(4) of the Federal code of judicial conduct which states,

"(4) A judge should accord to every person who has a legal interest in a proceeding, and that person's lawyer, the full right to be heard according to law."

Further, Dr. Saxena's counsel has mentioned this and Dr. Saxena has mentioned this that the discovery has not been completed.

Discovery has not been done in good faith and Defendant is hiding several documents in its possession that are materially important in this case and that were requested via discovery. Depositions have also not been done and these facts have not halted the case.

Defendant is attempting to repeatedly silence these facts from the court record even though these were filed by Plaintiff's counsel and the court is refusing to look at the motions highlighting these facts in more detail filed by Plaintiff. This is very unjust and unfair.

Defendant has held several depositions on Dr. Saxena but has refused to hold depositions on itself. A litigation cannot be allowed to be one-sided. Dr. Saxena wishes to have these matters reviewed by the appellate court.

Dr. Saxena's counsel has informed him that he has been in the ER. Thus, Dr. Saxena kindly requests the court to stay the case for at least two weeks.

Dr. Saxena also respectfully requests the court to let him file on his behalf on the matter of recusal under canon 3A(4) and also stay the case until an interlocutory appeal has been filed and decided by the Appellate court.

A handwritten signature in black ink, appearing to be 'V. Saxena', with a stylized flourish at the end.

Dr. Vishal Saxena

April 27, 2023

From: Vishal Saxena
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Maldenborough, MA 01752

To,
COURT CLERK
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